

**U.S. Department of Justice**

*United States Attorney
Southern District of New York*

*The Jacob K. Javitz Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278*

April 30, 2025

BY ECF

The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Farhad Shakeri, et al., 24 Cr. 670 (LJL)

Dear Judge Liman:

The Government respectfully submits this letter to request, with defense counsel's consent, that the pretrial conference scheduled for May 6, 2025 at 10:00 a.m., be adjourned to June 24, 2025 at 12:00 p.m., a date and time on which parties understand that the Court is available. Since the parties were last before Your Honor, the Government has continued discovery productions to the defense, consisting largely of the contents of electronic devices and accounts. That discovery is voluminous and, as a result of technical issues, the process of obtaining extractions in a usable format to produce to the defense has taken longer than anticipated. The purpose of the requested adjournment is for the Government to complete its production of electronic data in discovery and provide the defense with time to review those materials.

To the extent the Court grants the requested adjournment, the Government respectfully submits that the ends of justice served by the exclusion outweigh the best interest of the public and the defendants in a speedy trial because it will permit time for the production and review of discovery and discussions about the case between the Government and defense counsel. *See* 18 U.S.C. § 3161(h)(7)(A). Counsel for defendants Rivera and Loadholt do not object to this request.

Respectfully submitted,

JAY CLAYTON
United States Attorney

By: _____/s/
Jacob Gutwillig
Michael Lockard
Assistant United States Attorneys
Julie Isaacson
Special Assistant United States Attorney
(212) 637-2215 / 2193 / 1399

cc: Defense Counsel (by ECF)